

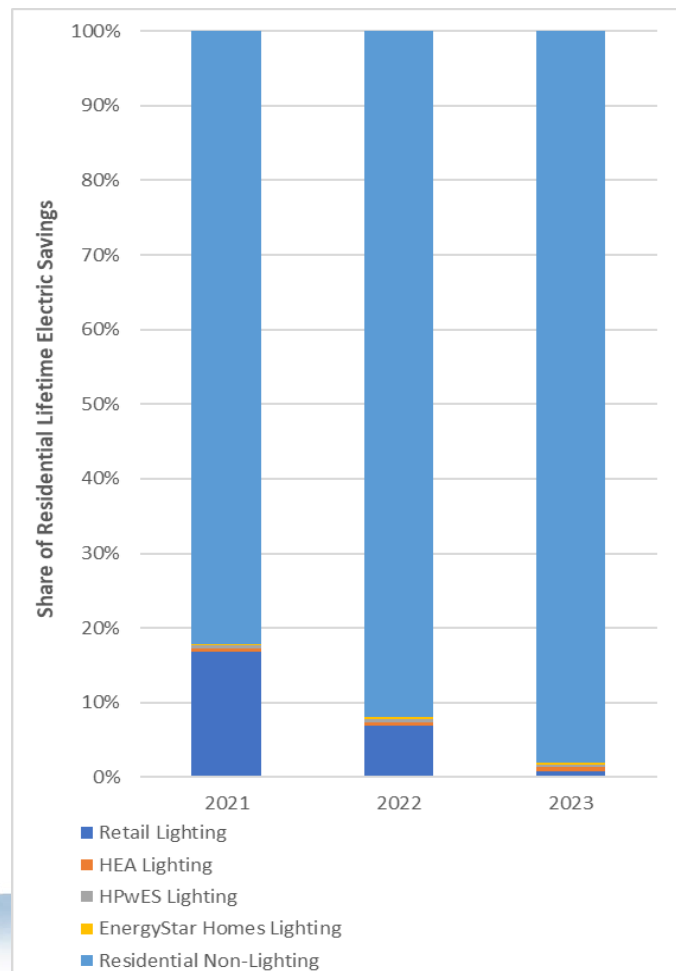
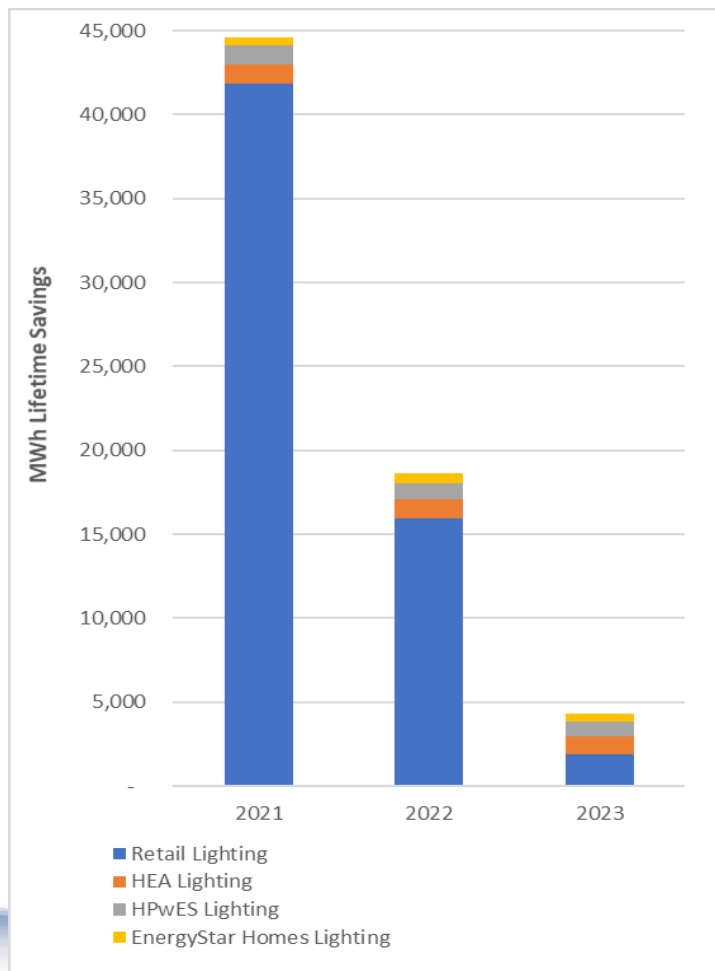
EERS Committee Meeting

June 1, 2020

Approach to Lighting

2021-23 Statewide Residential Lighting, Savings by Program (April 1 Draft Plan)

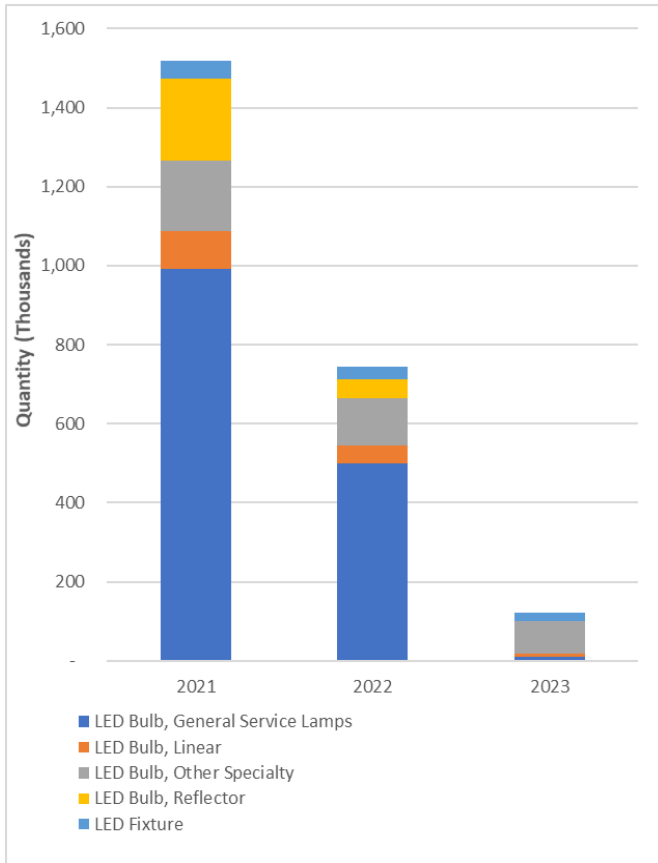
- Lighting decreases from ~18% to ~2% of residential lifetime electric savings, driven solely by drop-off in retail lighting
- Retail lighting decrease due to (1) fewer bulbs and (2) lower lifetime savings per bulb (measure life ↓, net-to-gross ↓)



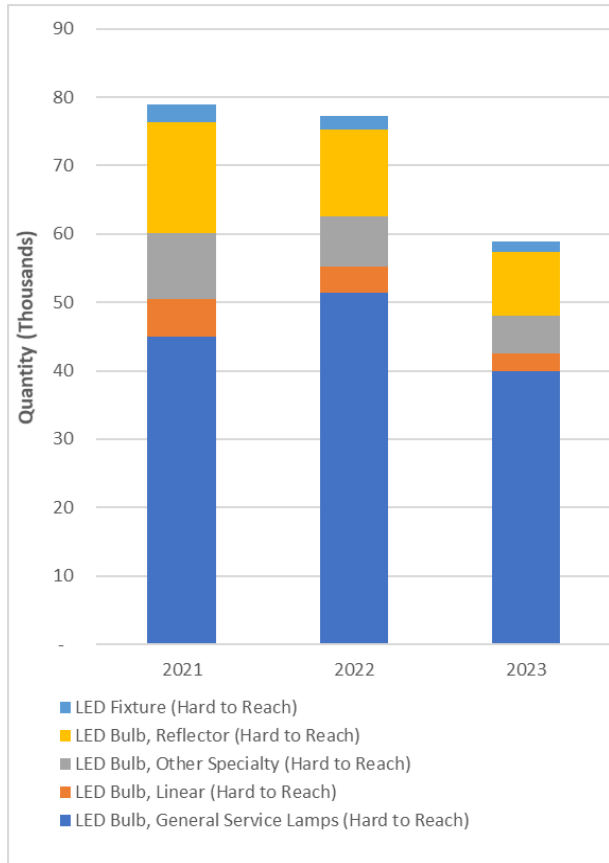
*Savings are net for retail, and adjusted gross for other programs.

2021-23 Statewide Retail Lighting, Quantity by Bulb Type and Channel (April 1 Draft Plan)

- **By 2023, retail lighting is almost entirely limited to Specialty Bulbs and Hard-to-Reach (discount/dollar) stores (~1-2 year lag from MA)**



Non Hard-to-Reach (HTR)
(e.g., big box retailers)



Hard-to-Reach (HTR)
(e.g., discount & dollar stores)

A-line/General Service Lamp



Reflector



Specialty



Key Residential Lighting Study Results

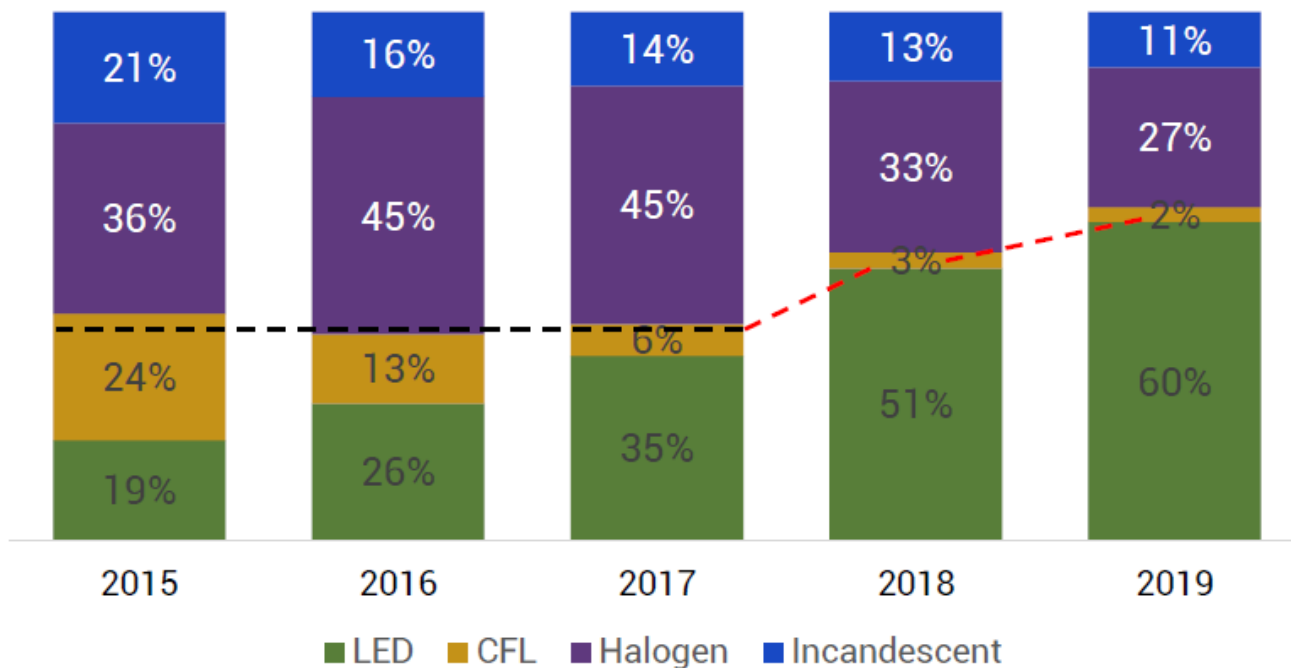
- **NH efficient bulb saturation levels are similar to MA and CT, and ahead of non-program states**
- **NH market share of LED sales is ~1-2 years behind MA market share, and ahead of non-program states**
- **In all 3 states, a minority of incented LED savings are attributed to the EE programs**

Metric	NH value	MA value	Other value(s)
Residential Socket Saturation	62% efficient bulbs (52% LEDs + 10% CFLs) <i>Q4 2019 data collection</i>	57% efficient bulbs (34% LEDs + 23% CFLs) <i>Q4 2018 data collection</i>	CT: 47% efficient bulbs (23% LEDs + 24% CFLs) <i>Q2 2018 data collection</i> NY (no program): 40% efficient bulbs (2019)
Market Share (% LEDs, estimated by participating retailers & manufacturers)	<ul style="list-style-type: none"> A-lines 2019: 86%; 2021: 90% Reflectors 2019: 85%; 2021: 88% Specialty 2019: 79%; 2021: 84% 	<ul style="list-style-type: none"> A-lines 2019: 92% Reflectors 2019: 93% Specialty 2019: 91% 	Non-program states: <ul style="list-style-type: none"> A-lines 2019: 72%; 2021: 76% Reflectors 2019: 72%; 2021: 75% Specialty 2019: 66%; 2021: 66%
Net-to-Gross (NTG) ratio <i>(i.e., % of savings from incented bulbs that are attributable to the programs)</i>	No primary research; applying CT values with a one-year lag	<ul style="list-style-type: none"> A-lines 2019: 35%; 2020: 30%; 2021: 25% Others 2019: 45%; 2020: 40%; 2021: 35% 	CT (all bulb types): <ul style="list-style-type: none"> Non-HTR 2019: 36%; 2020: 33% HTR 2019: 56%; 2020: 53%

Key Residential Lighting Study Results: Market Share based on Sales Data

Overall U.S. Sales: LED market share continued to grow in 2019, reaching 60% across all retail channels and lamp styles (Figure 1). As it had in 2018, the growth in LED share in 2019 came at the expense of halogen and incandescent lamps. In prior years, growth in LED share had primarily come at the expense of CFLs.

Figure 1. Total U.S. Market Share by Lamp Type and Year



MA Retail Lighting Program Approach

- **By 2021, MA retail lighting is limited to Specialty Bulbs and Hard-to-Reach (discount/dollar) stores**
- **Adjusted measure lives for all bulbs = 2 years** (NH measure lives = 2 years for reflectors, and 3 years for A-line and specialty)

	2020	2021
A-line	Offered in all stores ML: 2 years	Hard-to-reach only ML: 2 years
Reflector	Offered in all stores (now), may shift to HTR-only ML: 1 or 2 years (TBD)	Hard-to-reach only ML: 1 or 2 years (TBD)
Specialty	Offered in all stores ML: 3 years	Offered in all stores ML: 2 years

*Measure lives (ML) are adjusted to account for the potential for future lighting standards & markets to lead the same sockets reached through the program to have been occupied by an LED in a period shorter than the technical life of the LED.

Example:

High-use incandescent, technical life = 2 years
High-use LED, technical life = 10 years

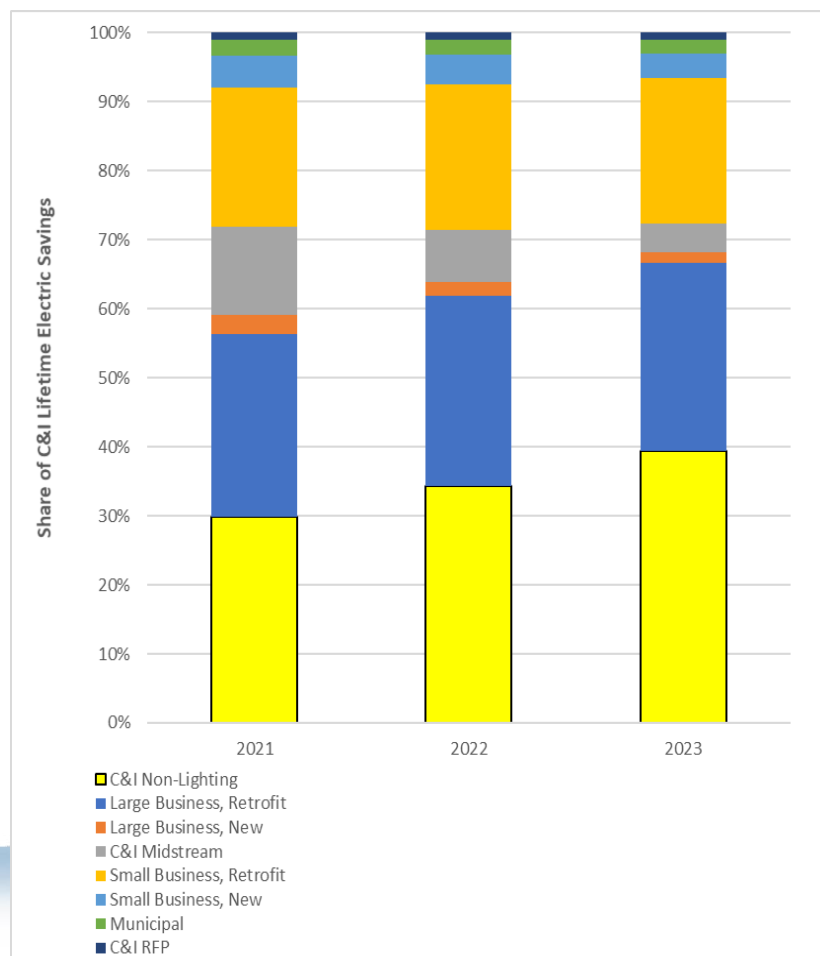
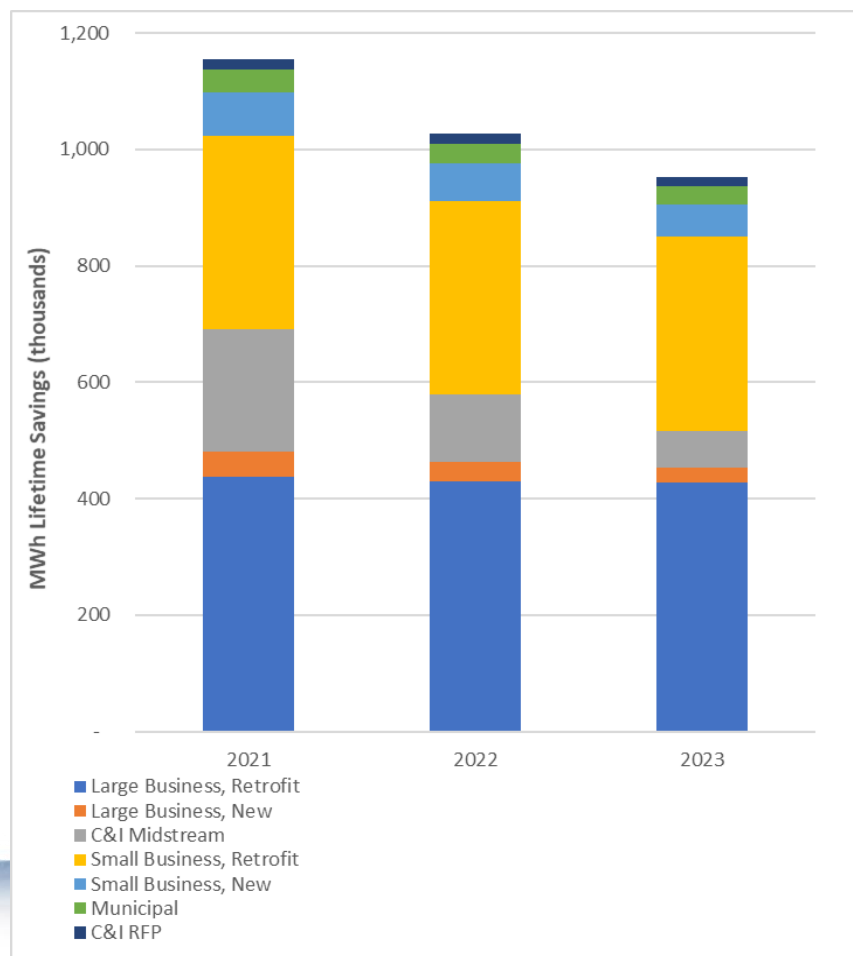
Assuming lighting standards and market transformation, today's baseline incandescent would likely be replaced by an LED anyway when it burns out in two years. So today's program-supported LED can only claim two years of savings.

Uncertainties & Forthcoming Results

- **EISA:** DOE has rescinded the expanded general service lamp (GSL) (i.e., A-line) definition from early 2017 and rejected the 45 lumens per watt backstop of EISA
 - Halogen bulbs can continue to be manufactured, imported, and sold for almost all residential lighting applications, and incandescent bulbs for many applications
 - Supplier interviews indicate suppliers are confident that the decisions will not greatly impact their short-term practices, but they are less certain of the mid- to long-term impacts
- **COVID-19:** Impacts on resi lighting markets will unfold in the coming months, and may persist over the long-term depending on factors such as continued work-from-home practices
 - Will consumers opt for low-cost halogens and incandescents, assuming LEDs remain more costly?
 - Can LEDs be positioned as a superior choice for home offices in terms of light quality and cost efficiency (given increased hours of use)?
- **Forthcoming NH EM&V results:**
 - Analysis of 2019 sales data to assess LED market share, bulb sales, and bulb shipments in NH, MA, CT, and RI, as well as states without upstream lighting programs. Results in Jul-Aug 2020.
 - Potential Study, will reflect the saturation and sales results previously mentioned. Results in Jul-Aug

2021-23 Statewide C&I Lighting Savings, April 1 Draft Plan

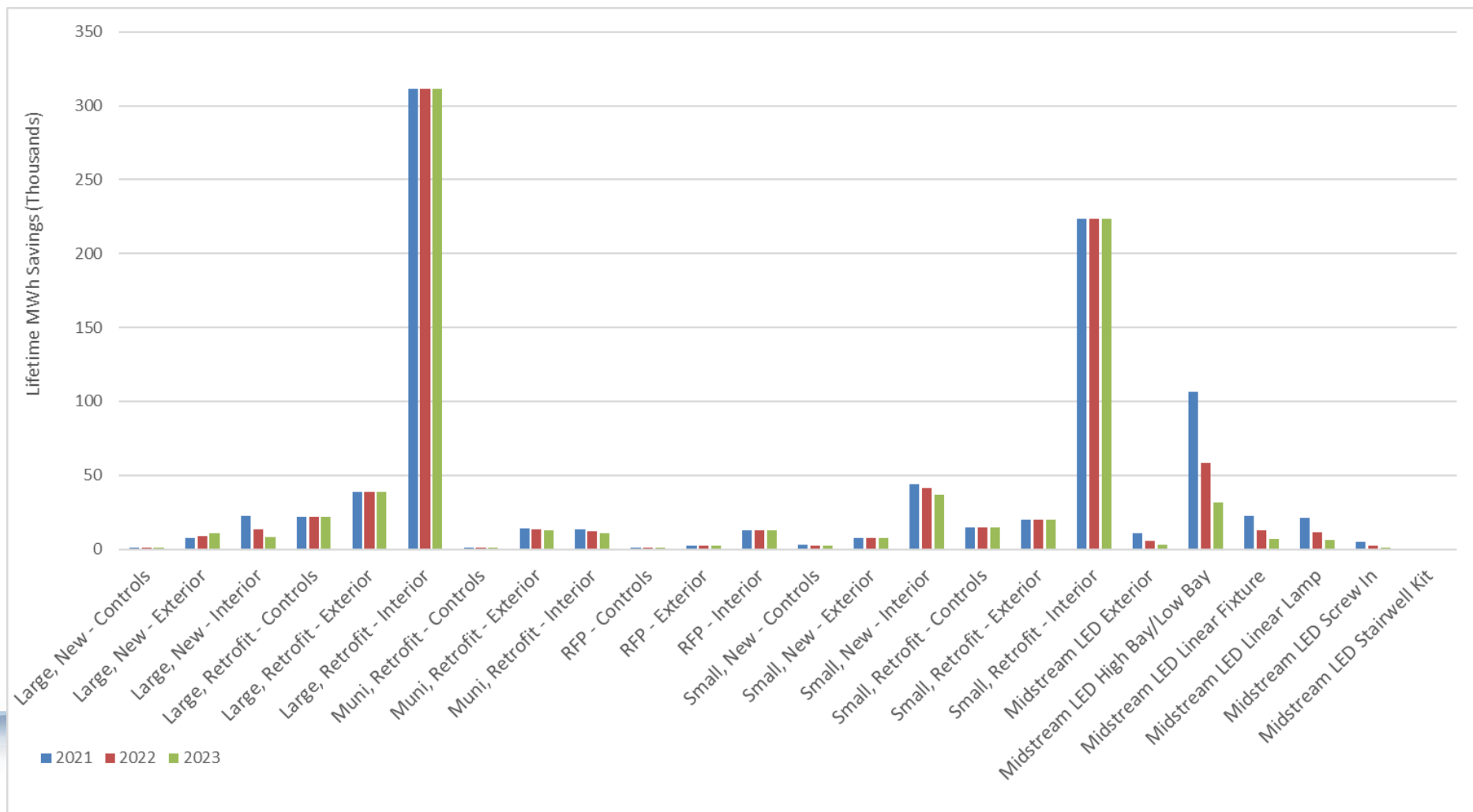
- Share of non-lighting savings increases ~10% over 2021-23, displacing decreases in midstream and new lighting savings
- Direct install retrofit lighting grows from 67% to 80% of C&I lighting savings over 2021-23



*Savings are net for midstream, and adjusted gross for other programs.

2021-23 C&I Lighting Savings by Project Type, April 1 Draft Plan (Eversource)

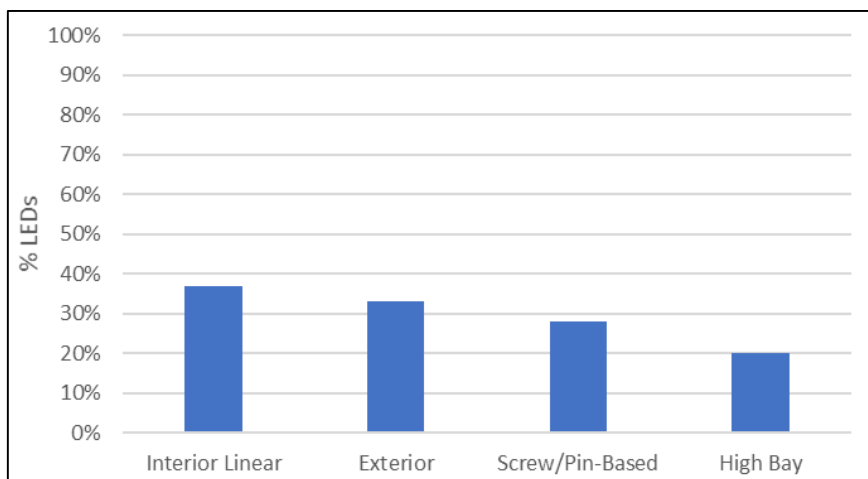
Three-year savings are dominated by retrofit projects (same as statewide trend)



Key NH C&I Lighting Study Results

- A large share of current lamps are non-LED, but most new sales are LEDs
- Substantial retrofit savings still available, but new/replace on failure opportunity is more limited

ERS C&I Customer “Barriers” Survey, questions on current (Q1 2020) LED saturation
(*partial results from 140 mostly small businesses, prior to COVID-19 shutdown*)



- 54% of respondents have done lighting projects in the past 3 years
- 85% of those projects were installations of LEDs

Key NH C&I Lighting Study Results

ERS/DNV-GL interviews with 17 lighting distributors and manufacturers who participated in lighting programs and sold in MA and NH

In 2019, about what percentage of your sales of [lighting application] to the Massachusetts C&I sector were LED? (n = 17)

Application	Type	Min	Max	Average
Ambient linear	TLED	0%	86%	39%
	Fixture	14%	100%	49%
	Non-LED	0%	55%	12%
High/low bay	LED	45%	100%	89%
	Non-LED	0%	55%	11%
Exterior	LED	40%	100%	85%
	Non-LED	0%	60%	15%

- Respondents generally said % LEDs would be the same in NH as MA (except 3 respondents said ambient linear % LED is lower in NH)

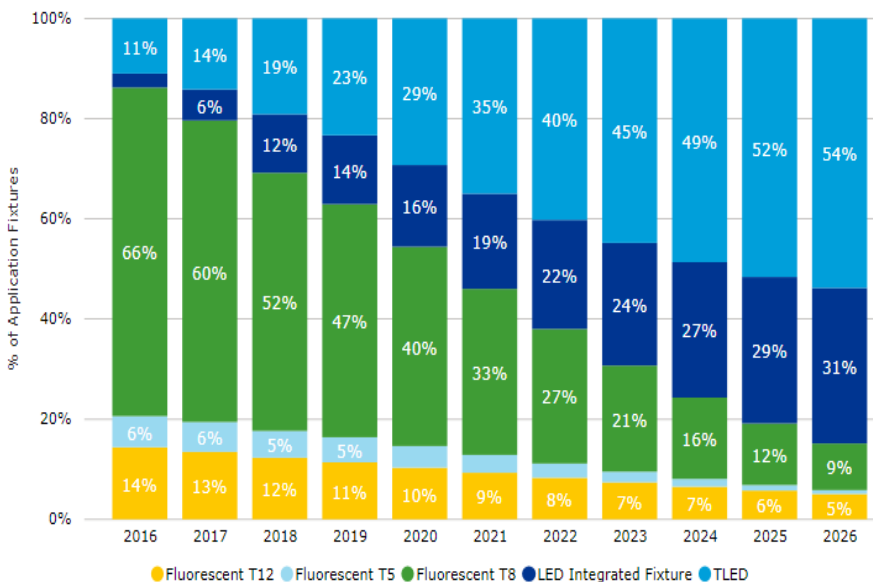
Supplementary comments made by a majority (n=10) of the interviewed trade allies support that the NH market is less transformed than the MA market:

- MA is a more mature market (n=4)
- Just recently started selling into NH or participating in the NH incentive program (n=3)
- Do not sell a lot into the NH market/only sell to a small portion of the state (n=5)

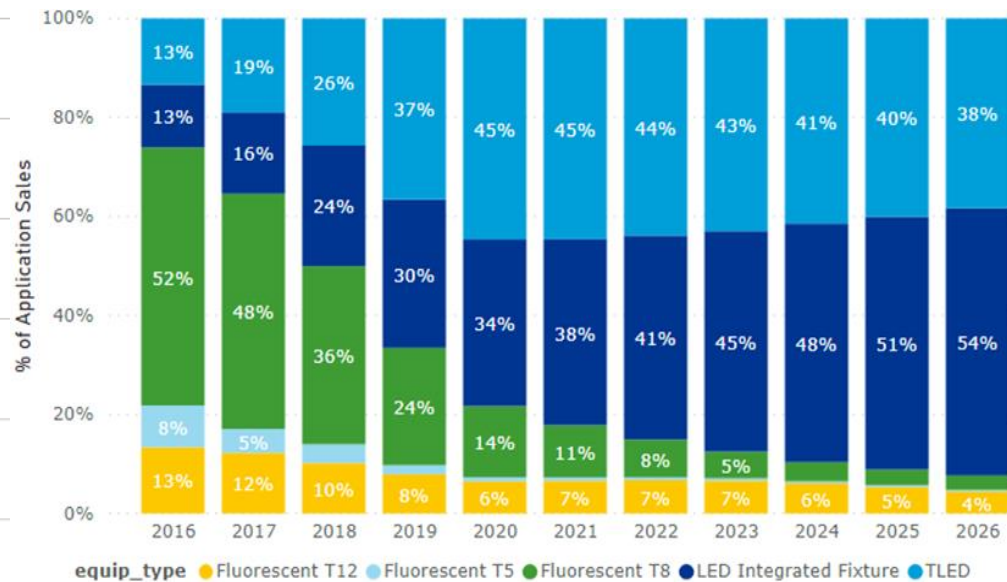
Key MA C&I Lighting Study Results

- **Distributor estimates show LED linear saturation of ~37% in 2019 and ~45% in 2020**
 - Calibrated using ~100 on-site inventory assessments in MA
 - Saturation data reinforces market actor statements that the MA market is moving quickly
 - These percentages reflect a NH lag of ~1 year behind MA in saturation, based on ERS survey data showing ~37% LED saturation of interior linear lamps in Q1 2020.
- **Estimates of LED market share of new sales—~80% in 2020—are in similar range as NH estimates**

Linear Saturation, % of Fixtures

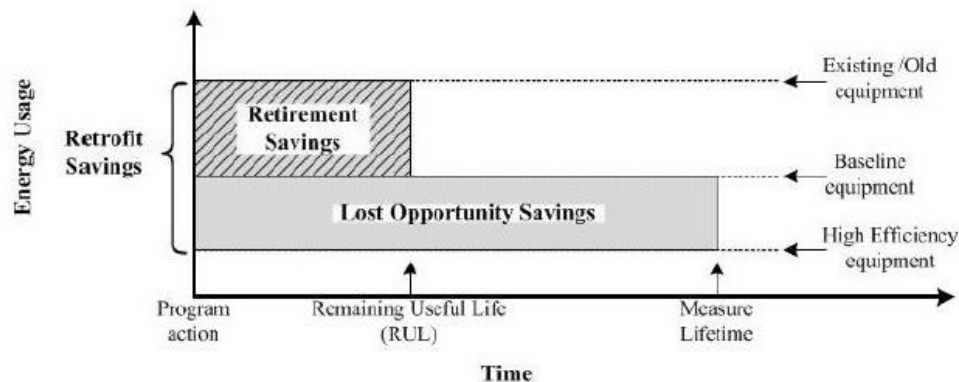


Market Share, % of Sales



C&I Lighting Program Approach

- **Substantial remaining opportunity for retrofit projects** under a dual baseline regime (several years of early retirement savings, minimal lost opportunity savings)



- **Limited opportunity for new/replace on failure**, as most sales (80-90%) are already LEDs
 - NH market is likely behind MA, but unclear by how much
- **COVID-related impacts** may significantly increase barriers for certain C&I segments
- **Forthcoming C&I evaluation results:**
 - Remaining barriers survey responses (targeting 600 responses, including the 140 already done)—will feed into Potential Study, results in Jul-Aug
 - Industrial customer phone audits (70 targeted industrial customers)—will feed into Potential Study, results in Jul-Aug

Approach to Savings and Budgets

COVID-19, Impacts to every customer sector

- NH Unemployment rate close to 17% for April
 - <https://www.nhes.nh.gov/elmi/statistics/documents/nr-current.pdf>
- Census Bureau Pulse Survey for small businesses
 - <https://portal.census.gov/pulse/data/>
 - 47.5% reporting Coronavirus has had a large negative effect, 41.8% a moderate negative effect
 - 68% reporting a decrease in operating revenues in the last week

COVID-19, Impacts to every customer sector

- Municipalities fear long-term negative fiscal impacts
 - <https://www.nhbr.com/nh-municipalities-fear-long-term-and-significant-covid-19-fiscal-impacts/>
- Large businesses reducing or eliminating capital expenditures
 - 50% of Eversource RFP projects canceled.
 - MOU customer had 40% reduction in cap-ex available
 - Universities canceling cap-ex.

How are other states approaching plans?

- CT – Plan to file reductions for 2020, evaluating potential changes to 2021
- MA – Just beginning 2022-2024 planning process
- ME – On May 1, requested reductions to FY 2021 budgets and targets for heat pumps and heat pump water heaters
 - <https://mpuc-cms.maine.gov/CQM.Public.WebUI/Common/CaseMaster.aspx?CaseNumber=2018-00321>
- RI – Target for all-cost effective set based on potential study. Anticipate plan and budgets will be adjusted from target to take covid-19 and other factors into account.
 - <http://www.ripuc.ri.gov/eventsactions/docket/5023page.html>
- VT – Business as Usual approach for 2021-2023

Uncertainty and inherent tension in determining approach

- Instinct is to lower budgets (and thus SBC rates) in first year to minimize customer impacts.
- Instinct is also to lower savings target for first year and possible out years, due to stop in ramp and uncertainty about future
- However, we hear that achieving more kWh savings, if at all possible, is still very important to stakeholders.

Option 1 – 2020 Reset

- Initial inclination of NH Utilities is to take a deliberate approach
 - 2021 becomes rebuilding year, ramping back up to planned 2020 budget levels
 - Savings may be less than 2020 Plan, assuming higher incentive levels needed
 - Continued measured ramp in budgets for 2022 and 2023,
 - Savings could not increase at the same rate as budgets due to changes in lighting availability and assumptions
- If opportunity and marketplace are better than expected, utilities could over-spend the year 1 and potentially year 2 budgets, capturing as much savings as possible.
 - Mid-term modification could be utilized at some point during year 2 to increase budgets and savings targets for triennium.

Option 2 – “Business as Usual” Planning

- Utilities could use the April 1 Draft approach to budgets and savings, modifying slightly based on new information and stakeholder feedback.
 - Possibility that full year 1 budget is not spent and year 1 savings target not met
 - Excess budget can be moved into year 2, but savings are more expensive to achieve in year 2, thus harder to make up
 - Possibility that higher incentives than planned are needed in year 1, full budget does not achieve year 1 savings target
 - Can continue to work toward achieving savings target in year 2 and 3, but savings are more expensive in these years.
 - May end up needing to request modification to increase budgets and/or lower goals. Approval of such a request not guaranteed.
 - Very small possibility that year 1 similar to April draft is actually achievable

Option 2 – “Business as Usual” Planning

- BAU planning does continue NH’s energy efficiency ramp and provides the budget and opportunity to achieve increased savings in year 1 if possible.
- BAU planning also poses significant risk.
- Foreseeable poor market conditions in Year 1, combined with declining lighting opportunity in Years 2 and 3 means BAU targets are extremely difficult to meet with BAU budgets.
- Increased PI targets as well as lowering savings and benefits thresholds can mitigate and reward risk.

Additional Stakeholder Comments and Response

3-Year Planning Process

Stakeholder Feedback

- Consider 1 year plan for 2021 and two-year after (Staff)
- Multiple comments related to details of process (Staff and OCA)
- MTM's and Notifications brought to EERS Committee prior to filing with Commission (OCA)
- Moving from Pilot to Program (Staff)

Utility Response

- Proposing a 3-year, 36 month approach to provide various advantages, including flexibility, reduced burden on parties, increased focus on highest priorities.
- Utilities have discussed mechanics with Staff and answered various questions. Additional detail will be included in July 1 draft.
- MTMs are intended to be for extraordinary circumstances; goal of process is to reduce administrative burden and delay.
- Moving from pilot to program needs further discussion about whether notification or MTM is required (depends on budget and savings implications).

Performance Incentive Structure

Stakeholder Feedback

- Would PI be for individual years or all 3 combined? (Staff)
- PI should be based on budget not spending (Optimal)
- PI needs more detail and discussion (OCA)
- Metric related to Covid as a hedge but no other changes to accommodate risk
- Active Demand element needs to be described in filing (OCA) and should be based on shared savings (Staff)

Utility Response

- PI will be booked each year based on that year's performance, but the Final Earned PI will be based on each utility's performance in meeting their goals over the entire 3-Year Term.
- Basing PI on budget (rather than spending) was discussed at length in PI WG; utilities very open to using budget, but ultimate consensus was to continue to base PI on spending.
- Metrics and weighting were determined in PI WG. Will add more detail on how PI will be calculated to July 1 draft.
- Adjustments to target % and thresholds the most streamlined way to handle risk.
- ADM will be more fully fleshed out in the July 1 filing. "Shared Savings" is not well understood and would need additional review.

Funding

Stakeholder Feedback

- How will carryforwards from 2020 be treated? (Staff)
- Amortize Costs to reduce initial rate impact and align with measure lifetimes. (OCA)

Utility Response

- Covid has impacted both utilities' revenues and our ability to expend funds on energy efficiency programs. Separately, the mild winter led to lower revenues from natural gas than budgeted.
- We are still working on estimating what the 2020 ending balance for EE programs is likely to be.
- Projections on 2020 will become more clear once enhanced incentives are available.
- All anticipated carryforwards will (as always) be included in the revenues available to spend in the 2021-2023 Term, reducing rate impacts.
- Funds could also be used for additional capital for on-bill loans.
- Could propose a single SBC rate per utility for the whole term (rather than a different rate each year), to smooth out bill impacts.
- Not intending to utilize Amortization, as it would increase costs in the long run and creates other complications related to carrying debt.

CI&M Programs – Large Business

Stakeholder Feedback

- Clarify Approach to Commissioning (GDS)
- More Detail on Incentive approaches (OCA)
- Support Multi-family efforts, need to clarify approach (Optimal, VEIC)
- Multiple suggestions on measures (VEIC, OCA)
- Not a full Strategic Energy Management offering (VEIC)
- Encourage Performance Contract approach (Staff)

Utility Response

- Commissioning included for retrofit, but not for New Buildings. (Program staff to follow-up with GDS).
- Will add more Detail on Incentive approaches to July 1 draft
- Multi-family is currently, and effectively, served through multiple programs and we do not plan to create a stand-alone program at this time, but will work to clarify in narrative
- Reviewing measure specific suggestions and will add information to narrative where applicable
- Focus on multi-year commitments and long-term planning based on customer needs and interest rather than formal SEM
- Performance contracting has been and will remain a key element to our approach, particularly for municipalities, schools and State of NH. Will add more detail to narrative.

CI&M Programs – Small Business

Stakeholder Feedback

- Recommend more engagement with market contractors (VEIC)
- Fuel Neutral – Do not support fossil boilers/furnace. (Optimal) Draft did not expand FN to Small Business (VEIC)
- Utilize on-bill financing for positive cash flow and to reduce barriers (OCA)
- Follow-up to encourage measures beyond lighting when customer does not do everything at once (VEIC)
- Other suggestions on measures and approaches (Optimal and VEIC)

Utility Response

- Utilities agree that more engagement with market contractors is important
- Given resource constraints, we are not including fossil fuel related offerings in commercial programs
- The utilities will continue to utilize on-bill financing for positive cash flow and to reduce barriers
- Reviewing measure specific suggestions and will add information to narrative where applicable

CI&M Programs – Municipal

Stakeholder Feedback

- On-bill financing an important element (Optimal)
- Do not support replacement of oil/propane heating equipment (Optimal)
- Effectively engaging smaller and more rural municipalities will require improved technical and capacity assistance, as well as addressing challenging cost-effectiveness screening (CENH) More detail on engagement (staff)
- Concern that plan indicates non-cost effective muni projects will be allowed (OCA)
- Encourage an RFP process for Main Street Initiative (Staff and OCA)
- Overlap in Large, Small and Muni, do they really need to be separate programs?

Utility Response

- The utilities will continue to utilize on-bill financing to reduce municipal barriers to participation.
- The Muni program is funded by RGGI, and therefore high efficiency oil/propane heating/hot water equipment are offered, however these are not common.
- We will continue to engage with smaller and more rural communities / energy committees and will include additional detail in the July 1 narrative.
- The Granite State Test will lead to more projects screen as cost-effective.
- The utilities are committed to delivering a cost-effective program and sector, but do allow individual projects to continue even if not cost-effective in order to maintain equity of access to programs.
- The utilities agree that a more structured approach for community selection is needed as outreach expands.
- The approach to each of the C&I programs shares certain elements, however distinctions in delivery, capacity and staffing exist.
- Muni is mandated by State law, and due to funding source, allows for fuel neutral measures. Will clarify distinctions in July 1 draft.

Residential – Home Energy Assistance

Stakeholder Feedback

- Address incentive cap – Eliminate cap (OCA), set a specific higher cap (Staff)
- Review and include HPWH's (OCA)
- Multi-family should be a specific offering. Target electric heat multis with heat pumps (OCA)
- Consider other entities to partner with, such as Habitat for Humanity (DES)
- Clarify interaction between HEA and WAP (Staff)
- Clarify what has to be cost-effective (OCA)
- New construction for Low-Income not in Plan? (VEIC)

Utility Response

- We will set higher cap, with ability for utility supervisor to review and override if cost-effective
- Heat Pump Water Heaters will be offered (will revise narrative)
- Multifamily properties are served regularly and comprehensively in HEA. Excellent relationships with public and private affordable housing agencies (will clarify in narrative).
- Heat pumps are already able to be retrofit electric baseboard (will clarify in narrative).
- Will clarify in July 1 draft:
 - relationship with Weatherization Assistance Program and Habitat for Humanity (we do partner with them, but typically in the Energy Star Homes program)
 - What has to be cost effective in the program
- Low Income new construction currently included in Energy Star Homes, but may consider accounting for it in low income.

Residential – Home Performance

Stakeholder Feedback

- Multiple comments on recruiting and retaining contractors (CENH, VEIC, OCA)
- Concern about including Health and Safety Measures (DES and Optimal)
- Address incentive cap – Eliminate cap (OCA), set a specific higher cap (Staff)
- More specifics on community based outreach (CENH)
- Multiple comments on qualifying for an audit, HHI calculator, 2 years of fuel use, eligibility criteria (CENH, OCA, Optimal, Staff)
- Questions about multi-family (OCA)
- Clarify approach to combined gas/electric homes (OCA)
- Plan implies customers must decide on the spot (OCA)

Utility Response

- July 1 draft will include more details on workforce development
- July 1 draft will clarify what H&S is supported and what is not.
 - Adequate ventilation is vital and must be ensured
 - Items like knob and tube are more of a customer responsibility
- We are proposing a higher cap, with ability for utility supervisor to review and override if cost-effective
- July 1 draft will include more detail on community based outreach
- Regarding qualifying for HPwES, we will expand onramps (e.g., virtual audits) that do not require HHI screening.
- Two years of fuel use not required, but need at least 1 year for accurate modeling. Will work to clarify pathways and eligibility in narrative.
- July 1 draft will clarify multi-family and dual fuel gas/electric approach in narrative, as well as fact that customers do NOT have to decide on moving forward at time of audit.

Residential – Energy Star Homes

Stakeholder Feedback

- Codes and Standards Attribution (GDS, DES, Optimal, VEIC)
- Questions about 80% by 2030 goal (DES and OCA)
- Questions on some of the pathways and offerings (OCA, VEIC)

Utility Response

- Currently researching regional approaches; expect to develop design and attribution of savings by September filing
- 80% by 2030 is an aspirational goal the team has identified. 2021-2023 savings and participation goals will be included in filing
- July 1 draft will clarify pathways and offerings

Residential – Energy Star Products

Stakeholder Feedback

- Clarify approach to lighting (OCA)
- Evaluate measures now rather than during plan, look to include more in midstream or Point of Sale, should be moving to mid-stream approach (OCA, Optimal)
- More description for how new technology is reviewed (VEIC)
- RPP needs more explanation (VEIC)
- Opportunity to expand thermostats for fuel neutral (VEIC)

Utility Response

- Presentation today should help; new research becoming available, will include in July 1 draft
- Actively moving upstream / point of sale this term; developing research plan to assess results.
- Will include additional detail in July 1 draft on:
 - how new technology is reviewed / incorporated into programs
 - Retail Products Platform
- Deploying fuel-neutral t-stats in targeted approach through visual audits, special promotions, w/heat pump purchases

Residential – Behavior

Stakeholder Feedback

- Aerial Infrared Mapping – is it behavior or HPwEs marketing, needs a B/C review, additional detail (Staff)
- Questions about CEP and Eversource approach (Staff)
- Questions about HER cost-effectiveness (Staff)

Utility Response

- Utility Specific approaches to evolution of behavior programs will be detailed in July 1 draft
- Eversource to provide information on approach to CEP and Behavior;
- Mid-Term Modifications will be submitted if new offering with savings is developed

Behavior – Aerial Infrared Mapping

- Aerial Infrared Mapping – is it behavior or HPwEs marketing, needs a B/C review, additional detail (Staff)
 - Specific implementation strategy still under development with MyHeat and academic partners
 - Intending to implement in tandem with current HER offering
 1. Distinct communication to separate test group
 2. Bundling MyHeat content as part of portion of existing HER recipients
 - Will measure:
 1. Resulting uptake in HPwES and HEA programs
 2. Behavior change impacts from distinct communications to separate test group from existing HER
 3. Impacts on existing HERs by including MyHeat content

Funding and Financing

Stakeholder Feedback

- Provide more detail on offerings (Staff)
- Provide detail on grant opportunities and a copy of the NHSaves Partnership report (Staff)

Utility Response

- Will review and revise narrative to provide information on financing offerings and NHSaves Partnership
- Can provide 2020 Partnership report (but not explicitly a part of the Plan).

Marketing

Stakeholder Feedback

- Marketing should focus on NHSaves rather than the utilities (CENH)

Utility Response

- With the launch of the EERS, the utilities developed a statewide integrated umbrella marketing campaign promoting NHSaves, to increase awareness of programs and solutions offered jointly by the program administrators.
- The NHSaves brand facilitates consistency in the delivery of programs across the state, building on the trusted long term relationships the program administrators have with their customers.
- Through the use of a variety of channels and tactics the goal is to drive deeper participation in the programs.
- There will be an EERS Committee meeting for further discussion of marketing in July

Data

Stakeholder Feedback

- More detail on data sharing and tracking systems mentioned (Staff)
- State specifically how Statewide Data Platform will be integrated (OCA)

Utility Response

- The key data sharing and tracking systems referred to in program priorities are the *energy auditing* and *project tracking tools* for Home Performance and HEA. As noted by contractors in the public comment session, there are several upgrades needed to streamline these programs and those upgrades are underway.
- Exactly how SDP will be integrated into EE Programs is unknown at this time. Utilities are participating in DE 19-197

Workforce

Stakeholder Feedback

- Comments about the importance of workforce development from almost all stakeholders that provided comments

Utility Response

- Agree that a focused and comprehensive approach to workforce development is essential
- Existing offerings provide key training and development opportunities and can be leveraged
- Utilities are developing an RFP to bring on a lead vendor for Workforce Development. This vendor will be tasked with:
 - reviewing workforce needs in NH,
 - making recommendations on whether additional research is needed,
 - developing and making recommendations to the NH Utilities for a prioritized and comprehensive set of workforce development activities
 - coordinating workforce development and training offerings.

Energy Optimization

Stakeholder Feedback

- Multiple comments with general support for EO offering and interest in learning more (CENH, DES, Acadia, SNHS)
- Support initial steps toward EO, recommend a program rather than a pilot with no savings (OCA)

Utility Response

- Utility understanding is that the Commission suggested a pilot in their response to the B/C Working Group recommendations
- Plan to propose a more fleshed out EO pilot in the July 1 draft.
- Pilot could include 100 homes to be evaluated
- Leveraging the MA and CT PAs' experiences in Energy Optimization

Active Demand Management

Stakeholder Feedback

- Questions on whether ADR should remain in EE
- More information on EV charging approach (CENH)
- Concern about back-up generators (DES, Optimal, Staff)
- Multiple comments regarding more detail (staff)

Utility Response

- General consensus during 5/18 EERS Committee meeting that it should remain
- Will address EV, WIFI Thermostats with central A/C, and C&I Load Curtailment in more detail in July 1 narrative
- Only EPA Tier-4 generators allowed, intended to be lower emission than grid if used for DR
- Will provide additional details regarding stakeholder comments in July 1 draft

EM&V

Stakeholder Feedback

- Goals should not be adjusted for evaluation findings (OCA) Plan should address how EM&V studies would be applied (Staff)
- PUC EM&V Consultant should lead working group and manage study consultants
- Plan should explain changes made due to recent studies
- TRM drafting and updates should be done through EM&V WG

Utility Response

- Goals as filed (budgets, savings, benefits) will not be adjusted for evaluation findings unless significant unanticipated impact (see MTM triggers).
- EM&V Framework is working well, as per the EERS Subcommittee Guiding Principles.
 - Utilities as parties to contracts with study consultants must retain oversight.
 - EM&V facilitation role for consultant can be considered but prefer to allow for flexibility in plan to avoid possible discontinuities.
- Major changes resulting from evaluation studies will be described in the narrative of the Plan. Annual TRM update will also show measure assumption changes since prior version.
- Drafting of the TRM and updates is being done through EM&V WG and will continue to be.
 - EM&V WG to propose a mechanism for resolving possible disputes.